

MEMO ENDORSED

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April 28, 2020

Honorable Valerie E. Caproni
United States District Judge
Southern District of New York
40 Centre Street
New York, NY 10007

USDC SDNY
DOCUMENT
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Re: *United States v. Starlin Nunez, et. al.* 17 Cr. 438

Dear Judge Caproni:

I write this letter in response to Your Honor's April 3, 2020 request for a detail of my associate, Christian Urbano's hours in terms of my April 1, 2020 request for approval above the initial hours.

I did not realize that I would not receive an email with the notice of having to submit by April 17, 2020, but first saw it when I checked the docket this past Thursday to see if I had missed something. My apologies. I should have appreciated that if I was not receiving the Nunez case emails that would include any order on my letter motion.

My mother in law passed away on Thursday night so it has been a bit hectic, but I respectfully request that the Court accept the submission which is attached hereto and counsel will ensure that she checks the docket in the future rather than rely on an emailed response. I have reviewed for possible attorney client privilege since this is a public docket but believe that all entries are proper.

Please let me know if you need any additional information.

Thank you for your time and consideration.

Respectfully submitted,

/s/ Inga L. Parsons

Inga L. Parsons

Cc: Urbano, C.
ECF

Application GRANTED in part.
The hours appear excessive
overall. The Court will approve
50% of the associate's hours.

SO ORDERED.


5/1/2020

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE

**Christian Urbano CJA Time for Starlin Nunez from
December 1, 2017 through November 15, 2018**

<u>Date</u>	<u>Description</u>	<u>Hours</u>
12/8/17	(CJU) Review 12/1/17 email and attachments from E. Greenwood; email to E. Greenwood re: same; confer with I. Parsons re: Nunez status issues	0.3
12/20/17	(CJU) Review docket, key filings, orders, and discovery letters	2.4
12/20/17	(CJU) Review discovery and create and update defense summary/evidence log	2.5
12/21/17	(CJU) Review discovery and update defense summary/evidence log	3.2
12/22/17	(CJU) Review discovery and update defense summary/evidence log	3.8
12/22/17	(CJU) Phone disc with AUSA Scotten re: evidence concerning client	0.4
12/22/17	(CJU) Review discovery and update defense summary/evidence log	4.3
12/23/17	(CJU) Review discovery and update defense summary/evidence log	4.2
12/24/17	(CJU) Continue review of discovery and update defense summary/evidence log	6.4
12/25/17	(CJU) Continue review of discovery and update defense summary/evidence log	2.2
12/26/17	(CJU) Continue review of discovery and update defense summary/evidence log; email progress to I. Parsons	6.5
12/29/17	(CJU) Continue review of discovery and update defense summary/evidence log	0.8
1/2/18	(CJU) Review 1/1/18 Greenwood CDA Ex parte status report	0.1
1/2/18	(CJU) Review and complete Production 1-2 discovery documents, videos and photos and update defense summary/evidence log	7.3
1/3/18	(CJU) Review Video Discovery Production 10.27.17 and update defense summary/evidence log	4.5
1/30/18	(CJU) Review CD Rom discovery production and update evidence/discovery log	3.4
1/31/18	(CJU) Review CD Rom discovery production and update evidence/discovery log	2.5
2/1/18	(CJU) Review CD Rom discovery production and update evidence/discovery log	6.4
2/2/18	(CJU) Review CD Rom discovery production and update evidence/discovery log	4.5
2/2/18	(CJU) confer with I. Parsons re: particular evidence and defense issues and review evidence for same	0.2
2/5/18	(CJU) Continue review of CD Rom discovery production and update evidence/discovery log	1.7
2/6/18	(CJU) Continue review of CD Rom discovery production; review client's English-language jail house calls via index for both detention facilities	4.5
2/7/18	(CJU) Continue review of CD Rom discovery production; review client's English-language jail house calls via index for both detention facilities	5.2
2/8/18	(CJU) Continue review of CD Rom discovery production; continue review of client's English-language jail house calls via index for George Motchan Detention Center	4.8

2/9/18	(CJU) Continue review of client's English-language jail house calls via index for GMDC	5.6
2/9/18	(CJU) Review select Belliard jail calls (mostly Spanish discussions)	1.2
2/12/18	(CJU) Review 11.29.17 and 12.22.17 hard drive productions of numerous videos, photos and related case documents	5.1
2/13/18	(CJU) Review 1.5.18 production including electronic device extractions	0.6
2/15/18	(CJU) Research issues concerning show-up identifications	0.5
2/16/18	(CJU) Complete review of 1.5.18 production including electronic device extractions	2.4
2/21/18	(CJU) Detailed review of evidence and log for issues concerning pretrial motions	4.3
2/22/18	(CJU) Continue detailed review of evidence and log for pretrial motion matters; confer with I. Parsons re: same	2.1
2/26/18	(CJU) Continue detailed review of evidence and log for pretrial motion matters	3.2
2/27/18	(CJU) Continue detailed review of evidence and log; prepare memo of issues for pretrial motion(s)	4.4
2/28/18	(CJU) Review certain specific evidence and discovery for upcoming motion in limine deadline	3.3
3/1/18	(CJU) Review govt and Greenwood discovery letters to court; review recent discovery cover letter	0.2
3/22/18	(CJU) Review recent discovery	0.5
3/22/18	(CJU) Confer with I. Parsons re: facts and evidence for pretrial motions and motions in limine	0.5
3/23/18	(CJU) Review recent ECF filings	0.2
3/23/18	(CJU) Review recent discovery and prepare current key evidence log and related info necessary for pretrial motions	2.2
3/23/18	(CJU) Review detailed enterprise letter; email to I. Parsons re: additional predicate act issues	0.8
3/23/18	(CJU) Prepare separate evidence summary for certain issues	0.5
3/25/18	Review law for potential defense motions	0.8
3/25/18	(CJU) review evidence and confer with I. Parsons re: particular and specific facts for motions	1.5
3/25/18	(CJU) review additional information re criminal history allegations	0.2
3/26/18	(CJU) Review new voluminous discovery, motions, transcripts and written decisions provided by client's state court attorney; continue to update evidence log; provided email memoranda to I. Parsons re: certain new discovery	7.4
3/27/18	Continue review of Donald Yannella state court discovery and pleadings and update evidence log; provide I. Parsons with emails re: particular evidence	4.6
3/27/18	(CJU) participate in joint defense meeting conference call	1.2
3/27/18	(CJU) prepare dropbox files for defense counsel	0.3
3/27/18	(CJU) review in detail lengthy transcripts from state suppression hearing and compare to evidence for motion to suppress	4.4
3/28/18	(CJU) Confer with I. Parsons re defense strategies and potential motions	0.2
3/28/18	(CJU) prepare detailed index of state-court Yannella files for pretrial and trial purposes; circulate same	0.7

3/28/18	(CJU) continue review of Donald Yannella state court discovery, in depth review of hearing transcripts, pleadings and update evidence log; provide I. Parsons with emails re: particular evidence	9.6
3/28/18	(CJU) draft detailed email memorandum to I. Parsons re: numerous factual issues relating to potential pretrial motions	0.4
3/29/18	(CJU) Finalize review of additional Yannella discovery and updating evidence summary log	2.1
3/29/18	(CJU) review detailed information from client re evidence; cross check same	1.4
3/29/18	(CJU) draft and edit detailed factual background section for certain pretrial motions	4.6
3/29/18	(CJU) review ECF filings	0.2
3/29/18	(CJU) review government email re: motions in limine	0.1
3/30/18	(CJU) Confer with I. Parsons; review and edit pretrial motions	1.8
3/30/18	(CJU) review codefendant motions and ECF filings	0.6
4/5/18	(CJU) Begin review of defendants' motions in limine and Bruton motions and omnibus govt motion	0.4
4/6/18	(CJU) Continue review of defendants' motions in limine and Bruton motions; review and prepare outline of lengthy govt omnibus motion and enterprise letter	2.5
4/6/18	(CJU) confer with I. Parsons re: motion to suppress and motions in limine arguments; strategies for discussion with gov't	0.2
4/6/18	(CJU) conference call with I. Parsons and H. Scotten re: motion to suppress and plea negotiations	0.2
4/13/18	(CJU) Research law for response to nine-issue omnibus motion in limine	2.8
4/16/18	(CJU) Review co-defendants' numerous motions in limine and Bruton motions	2.2
4/16/18	(CJU) draft and edit certain sections of response to motion in limine	3.5
4/16/18	(CJU) confer with I. Parsons re: same	0.2
4/16/18	(CJU) emails to and from H. Scotten re: issues for trial	0.1
4/16/18	(CJU) review factual and legal arguments for response	1.2
4/16/18	(CJU) edit and finalize response to motion in limine	1.2
4/16/18	(CJU) continue review of co-defendant responses and research certain RICO law for hearing and trial	1.2
4/16/18	(CJU) review "attorneys' eyes only" letter (explanation was erroneously duplicated from above in evoucher--this is the actual work done)	0.3
4/16/18	(CJU) file response to motion in limine	0.3
4/17/18	(CJU) Attention to files; review ECF docket and additional responses to gov't motion in limine; research related law	3.4
4/18/18	(CJU) Review remaining responses to gov't motion in limine	0.8
4/18/18	(CJU) review gov't response to defendants' motions in limine; follow up research of citations and related law	3.2
4/18/18	(CJU) phone disc with I. Parsons re: strategies for defense and gov't assertions in pleadings	0.3
4/19/18	(CJU) Review gov't response to defendants' pretrial motions; prepare detailed notes for research and reply	2.4
4/19/18	(CJU) Research case law concerning issues for reply; review discovery videos, documents, and transcripts for reply	5.4

4/20/18	(CJU) Continue research of law and facts for reply; confer with I. Parsons re: client issues and reply; draft and edit reply to gov't opposition to motion to suppress; review additional discovery and criminal history for RICO issues	7.4
4/25/18	(CJU) Confer with I. Parsons re: strategies regarding plea and potential trial issues	0.4
4/27/18	(CJU) Review ECF and co-defendants' replies (Santiago and Santana) concerning similar Bruton issues	0.5
4/30/18	(CJU) Detailed research into certain potential sentencing enhancements and statutory matters relating to indictment and definitional issues	3.5
4/30/18	(CJU) Review recent cases concerning vagueness and application to RICO briefs	0.5
4/30/18	(CJU) Review recent law on RICO vagueness issues and dismissal	0.2
5/1/18	(CJU) Phone disc with I. Parsons and H. Scotten re: plea negotiations (erroneously entered 4/30/18 should have been dated 5/1/18 -- which is the default date from the previous entry if you forget to change it)	0.3
5/1/18	(CJU) follow-up disc with I. Parsons re: strategy for additional negotiations (erroneously entered 4/30/18 should have been dated 5/1/18 -- which is the default date from the previous entry if you forget to change it)	0.2
5/1/18	(CJU) continue detailed research and analysis of sentencing enhancement and definitional issues regarding certain counts in indictment (erroneously entered 4/30/18 should have been dated 5/1/18 -- which is the default date from the previous entry if you forget to change it)	0.5
5/2/18	(CJU) continue detailed research and analysis of sentencing enhancement and definitional issues regarding certain counts in indictment	1.5
5/3/18	(CJU) continue detailed research and analysis of sentencing enhancement and definitional issues regarding certain counts in indictment; draft and edit detailed memorandum addressing same	5.8
5/4/18	(CJU) continue drafting detailed memorandum addressing sentencing enhancement and definitional issues regarding certain counts in indictment; follow-up research concerning additional aspects of law	8.3
5/7/18	(CJU) Review additional discovery re: alleged photographic evidence relating to certain counts in indictment; draft email with I. Parsons re: same; update Evidence/Discovery Log with additional factual information	2.2
5/9/18	(CJU) research Djibo and Brady issues re: confidential witness discovery	1.2
5/9/18	(CJU) Follow up research re sentencing enhancement issues and review amended Second Circuit case on point	1.4
5/11/18	(CJU) Prepare email memo re: research on legal issues for I. Parsons client meeting at DMC	0.8
5/18/18	(CJU) Confer with I. Parsons re: co-defendant status, superseding indictment and fact issues	0.3
5/18/18	(CJU) Research on legal issues for sentencing enhancements and particular alleged illegal acts	2.8
5/18/18	(CJU) Review 5.11.18 discovery disc replacement excel pdfs	0.3

5/21/18	(CJU) Continue review of 5.11.18 discovery disc	0.8
5/21/18	(CJU) Review documents from investigator Nelson Lassalle	0.5
5/21/18	(CJU) Review plea offer drafts and analyze potential sentencing options	0.6
5/23/18	(CJU) Review and calendar court's 5.23.18 order for additional pretrial issues	0.3
5/23/18	(CJU) Continue review of documents from investigator	2.2
5/24/18	(CJU) Continue review of related court documents from Investigator N. Lassalle	2.1
5/25/18	(CJU) Continue review of related court documents from Investigator N. Lassalle	1.7
5/29/18	(CJU) Finalize review of related court documents from Investigator N. Lassalle	3.3
5/29/18	(CJU) Review additional 2016 home invasion state court materials from investigator and update evidence log	0.4
5/30/18	(CJU) Continue review of additional state court pleadings and update evidence log	1.8
5/30/18	(CJU) Email to I. Parsons re: client criminal history issues	0.4
5/30/18	(CJU) Attention to additional discovery	0.4
5/31/18	(CJU) Phone disc with I. Parsons re: potential plea and terms of agreement/negotiations	0.3
5/31/18	(CJU) Phone disc with A. Chow and I. Parsons re: plea agreement negotiations	0.1
5/31/18	(CJU) Finalize review of all relevant pleadings and documents from cases retrieved by investigator Nelson Lassalle	1.2
5/31/18	(CJU) Review and research criminal history issues and related sentencing guidelines and alternatives	0.9
6/1/18	(CJU) Review gov't letter/notice	0.1
6/4/18	(CJU) Confer with I. Parsons re: issues concerning criminal history, facts surrounding allegations, and related matters for change of plea hearing and plea agreement	0.4
6/4/18	(CJU) Review criminal history and related factual and criminal timelines; update evidence log and report findings to	1.5
6/4/18	(CJU) Review recent ECF filings	0.1
6/4/18	(CJU) Phone disc with I. Parsons re: plea issues	0.2
6/4/18	(CJU) Draft, edit and file motion to withdraw pending motions in limine and pretrial motions	0.4
6/4/18	(CJU) Follow up phone disc with I. Parsons re: additional complexities in plea and factual allegations	0.3
6/4/18	(CJU) Phone disc with N. Lassalle re: same	0.1
6/4/18	(CJU) Draft emails and pleadings to I. Parsons	0.1
6/4/18	(CJU) Review I. Parsons plea agreement outline for client and draft plea agreement	0.7
6/5/18	(CJU) Review ECF orders and sentencing information; update client evidence/case log	0.3
6/8/18	(CJU) Review USSG and law relating to sentencing strategies	0.5
6/12/18	(CJU) Review recent ECF entries; review certain allegations and similar legal sentencing arguments for client	0.4

7/16/18	(CJU) Review ECF orders and sentencing pleadings for codefendant fairness issues	0.7
7/26/18	(CJU) Review recent Second Circuit case law concerning sentencing issues and enhancement concerns for Nunez; draft email memo and follow-up memo to I. Parsons re: same	2.2
7/27/18	(CJU) Prepare FOIA A-File request; email to investigator N. Lassalle and I. Parsons re: same	0.6
7/27/18	(CJU) Review gov't letter re: contesting veracity of allocutions of the defendants including Nunez; follow-up email to I. Parsons	0.4
7/29/18	(CJU) Confer with I. Parsons re: sentencing and Fatico matters	0.1
7/30/18	(CJU) Review/analyze Belliard pleadings on position re: facts surrounding home invasion on 3/19/16; effect on Nunez	0.5
7/30/18	(CJU) Confer with I. Parsons re: Fatico hearing facts and legal issues	0.2
7/31/18	(CJU) Gather prior gov't representations in ECF Filings relating to position respecting issues for sentencing; email to I. Parsons re: same	0.4
7/31/18	(CJU) Review order concerning Fatico hearing and robbery	0.1
7/31/18	(CJU) Research law concerning role enhancements for multidefendant roles in robberies	0.8
8/1/18	(CJU) Continue research concerning role enhancements for multidefendant roles in robberies	5.2
8/1/18	(CJU) Review R. Martinez Fatico letter and corrected letter; forward same to I. Parsons	0.2
8/2/18	(CJU) Continue research concerning aggravating and mitigating role enhancements or reductions for multidefendant roles in robberies	3.2
8/3/18	(CJU) Finalize research on aggravating and mitigating role adjustments	4.2
8/3/18	(CJU) Review recent Mapp decision in EDNY re: crime of violence issues and second degree robbery under NYPL; draft followup email memo to I. Parsons supplementing prior memo re: same	0.4
8/5/18	(CJU) Review facts and PSR and application of role adjustments	3.1
8/6/18	(CJU) Review of PSR; compare to discovery and evidence log; detail objections and issues	2.2
8/6/18	(CJU) Review recent sentencing submissions and Fatico hearing filings	0.1
8/6/18	(CJU) Confer with I. Parsons re: legal issues surrounding predicate acts and sentencing	0.1
8/8/18	(CJU) Complete PSR review and comparison to facts and discovery; draft detailed email memo to I. Parsons relating objections and issues	2.3
8/8/18	(CJU) Additional legal research follow-up on role enhancements based upon PSR; draft and edit email legal memo to I. Parsons re: research on aggravating and mitigating role enhancements	0.8
8/8/18	(CJU) Multiple emails to I. Parsons attaching certain evidence and explanation re: home invasion for sentencing Fatico hearing	0.5

8/9/18	(CJU) Update and amend evidence log based upon PSR information; review facts relating to sentencing issues; review Second Circuit cases concerning same	2.1
8/9/18	(CJU) Review and update information in sentencing chart of all defendants for relative roles and treatment	0.1
8/9/18	(CJU) Revisit plea agreement due to PSR and plea agreement possible discrepancies; email to I. Parsons re same	0.4
8/13/18	(CJU) Review Court order re Fatico hearing and discovery schedule; email to I. Parsons; review discovery rule	0.1
8/23/18	(CJU) Review docket and orders due to granted continuances for deadlines; email to I. Parsons re same	0.1
8/24/18	(CJU) Gather victim information and email to I. Parsons for investigator	0.1
9/7/18	(CJU) Review recent court orders and ECF filings	0.1
9/9/18	(CJU) Confer with I. Parsons re: allegations by Nunez in letter to court; review court order	0.2
9/11/18	(CJU) Review gov't sentencing letter concerning relative culpability of each defendant; update evidence/case summary log; email to I. Parsons re: issues	0.4
9/11/18	(CJU) Review emails from defense counsel and N. Lassalle re: 3/19/16 home invasion	0.1
9/27/18	(CJU) Phone disc with J. Weigel re: transfer of all Nunez files to new counsel; certain issues concerning client	0.2
9/28/18	(CJU) Upload numerous client files to new counsel cloud server; emails to and from J. Weigel; gather all hardcopy files from I. Parsons office and my office; draft cover letter and ship overnight to J. Weigel law firm in NY	1.5
10/1/18	(CJU) Phone disc with J. Weigel re: clarification of facts and law based upon J. Weigel review of certain files	0.4
10/2/18	(CJU) Review and respond to J. Weigel re: issues concerning family of client and related sentencing support issues	0.4
10/3/18	(CJU) Emails to and from D. LaVerne and separately to client re: family member contacts and related issues	0.2
10/17/18	(CJU) Phone disc with J. Weigel re: additional facts and issues concerning home invasion and related evidence	0.4
	Total hours:	288.9